START

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

October 12, 1993

Mr. James E. Rasmussen
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, WA 99352

Dear Mr. Rasmussen:

Re: Notice of Deficiencies (NODs) for the 200 W Ash Pit and 218-E-8 Borrow Pit Demolition Sites

This letter transmits Ecology's comments on the 200 W Ash Pit and 218-E-8 Borrow Pit Demolition Site Closure Permit Application NOD Response Tables of June 30, 1993. The response tables and closure permit applications were reviewed for compliance with the closure requirements of final facility status standards in the State Dangerous Waste Regulations (Chapter 173-303 WAC).

I am requesting that the U.S. Department of Energy respond to these comments through the Unit Manager Issue Resolution. This process should be completed by December 14, 1993.

If you have any questions, please contact me at (509) 736-3035.

Sincerely,

Fenggang Ma
Nuclear & Mixed Waste Management Program

FM:mf
Enclosure

cc: (w/enclosure)
Bob McLeod, DOE
Dan Duncan, EPA
Scott Luke, WHC
Doug Sherwood, EPA
Administrative Record

cc: (w/o enclosure)
Cliff Clark, DOE
Randy Kreckel, DOE
Sue Price, WHC
Fred Ruck, WHC ✓

218-E-8 BORROW PIT DEMOLITION SITES CLOSURE REVISION 0
Ecology response to RL/WHC response 1

1. Increasing the level of detail of the closure plan will reduce the amount of time and effort necessary to review and revise the document. As far as comparing the level of detail with other closure plans, thus far no closure plans have been approved and conditions can be written into the plan to address deficiencies noted by the regulators. For example, there is one specific term used throughout the closure plan which needs to be addressed more. The term is "action level."

   Although the term "action levels" is defined within the closure plan as "concentrations of analytes of interest that prompt an action . . . ," the term is not defined by WAC 173-303. As the closure plan addresses a RCRA unit, and to avoid confusion on this subject, delete the "action level" phrase. It should be noted that a definition for "cleanup level" is provided by WAC 173-340-200 which may be used by reference of proposed WAC 173-303-610 (scheduled to promulgated in Dec. 1993 to amend WAC 173-303-610 to include WAC 173-340-700 through 760 except 745).

2. Concur with part of the revisions of the closure plan to reflect the information provided in the response. However, the increase of 25 weeks is not acceptable according to the TPA. In TPA Section 9.6.2, it is stated that non-rad waste analyses have a maximum turnaround time of 50 days. Also in TPA Section 9.6, the maximum validation and transfer times are 21 and 15 days, respectively. Thus, the maximum per Sample Delivery Group (SDG) should be 86 days. Revise the text accordingly.

   Due to suspect reporting and record keeping of wastes managed at this TSD unit, Appendix IX analysis of 40 CFR part 264 will be required at this unit.

3. Concur. Copies of WHC's manuals referenced should also be sent to the Department of Ecology's Kennewick office.

4. Concur with the revision of text to reflect the form in which the wastes were disposed.

5. The waste codes in Table T4-1 do indicate that the material was not spent. But the Table fails to provide enough information to adequately designate the waste. The sources of information provided are inappropriate for the purposes of waste designation.

6. Concur with the addition to the text of the information provided in the response but the source of information must be provided.

7. Concur.

8. Concur with the addition of this information in text. However, a map, which shows the location of the demolition site and its vicinity, should be provided in the next revision. Also the fence should be maintained to prevent further access and trespassing by non-TSD personnel. If the fence is not there anymore, a fence and warning signs should be placed around site.

9. Concur.

10. a. Concur with addition of this information in text.

    b. Concur with addition of this information in text. Elaborate on the impact to waste deposition.

    Note. Disposal of the remnants of a waste container in a sanitary landfill was inappropriate, due to the fact that without analysis it was not possible to determine if the container contained a listed waste or not. If it did the container would have been considered a listed waste.

    c. Refer to response on NOD number 6.

    d. Eliminating analytes without the evidences of legitimate documentation is not acceptable. In order to ensure potential contamination will not be missed, Appendix IX analysis of 40 CFR part 264 is required.

    e. Concur with addition of this information in text.

11. See NOD Nos. 34 and 4 responses.

12. See NOD No. 10 response.

13. Concur with the inclusion of detonation materials in lists of analytes. Also include reaction and/or decomposition products as analytes. Additionally, due to suspect reporting and record keeping of wastes managed at this unit, Appendix IX analysis of 40 CFR part 264 will be required at this facility.

14. The response does not address the deficiencies noted. Because sections -700 through -760, except - 745, of MTCA is expected to be incorporated into the Dangerous Waste Regulations before implementation of the closure plan, it is appropriate to incorporate MTCA standards (see draft clean closure guidance). But the information regarding the waste source and physical state will be required to be incorporated into the closure plan.

15. See NOD No. 34 response.

16. Concur with response. Revise the closure plan to reflect the information provided in the response.

17. See NOD No. 13 response.

18. Refer first and second parts of the question to NOD nos. 10d and 42 responses respectively.

    Concur with the correction of third part of the question.

19. a. Give the definition of "Protective Closure."
    b. 218-E-8 BPDS is regulated as a miscellaneous unit under WAC 173-303-680(4). The regulation requires that the unit must meet the postclosure care requirements of WAC 173-303-680(2), if the contaminated soils or ground water cannot be completely removed or decontaminated during closure.

20. Refer analytes traceable to the Ash Pit Demolition Site activity to NOD No. 34 response. Refer waste generated from the detonation event and the detonation materials to NOD No. 13 response.

21. Concur with the correction.

22. Ecology did receive The Hanford Site Soil Background. However, the document was considered incomplete. There is still a huge task ahead in order to finish the site-wide background analysis (see detail in the memo from Charles Cline, WA State Department of Ecology, to Steven Wisness, US DOE, dated May 10, 1993).

    Requirement. Ecology must review and approve the *Hanford Site Soil Background* (DOE/RL 1992d) for RCRA closures before the values can be implemented for closure.

23. Refer the action level to NOD No. 1 response.

24. HSBRAM has not yet been approved by Ecology. Only some of the risk assessment requirements of the MTCA Cleanup Regulation were incorporated in HSBRAM by DOE (see detail in the Memo from DOE to George Hofer, US EPA, and Roger Stanley, WA State Department of Ecology, dated May 5, 1993). Therefore, the health-based levels should be substituted, where appropriate, with MTCA cleanup levels.

25. Concur.

26. Refer the action level to NOD No. 1 response. If clean closure can not be achieved, postclosure requirements will be required regardless whether CERCLA remediation is available or not at that time. If the coordination between RCRA and CERCLA is planned for postclosure care, provide an explicit schedule in the next revision.

27. Concur with the correction.

28. See NOD Nos. 22 and 24 responses.

29. See NOD No. 2 response.

30. Refer the action level to NOD No. 1 response. See also NOD Nos. 44 and 45 responses.

31. Describe the instruments and methodologies used in the radiological survey in order to better understand the term "substantially free."

32. See NOD No. 2 response.

33. The purpose of the plan is to close the demolition site rather than remediate it. In order to clean close the unit, the contaminated soil or ground water should either be removed or decontaminated, otherwise the postclosure care is required. The soil sampling and analysis should emphasize this.

34. Due to suspect reporting and record keeping of wastes managed at the site, Appendix IX analysis of 40 CFR part 264 will be required at this unit.

35. See NOD No. 20 response.

36. See NOD Nos. 44 and 45 responses.

37. See NOD No. 17 response.

38. a. If initial samples at level II (EAL) indicate a "no action," confirmatory level III analyses will have to be done to verify this alternative.

    b. For every fifth sample, a split has to be taken and sent off for level III analyses. This will help determine validity of level II analyses as well as give some ICP/AA metals analyses.

39. Concur with the correction. See also NOD No. 2 response.

40. a. A list from SW-846 should be used instead of TCL from CLP.

b. Address the deficiency about how methyl ethyl ketone was determine to be only compound from TCL list present at site.

41. Concur.

42. Refer to NOD No. 34 response.

43. Refer to NOD No. 34 response.

44. Concur with EAL as analytical support to the investigative phase (level III). See additional requirements for EAL in NOD No. 38. Refer action limit (level) to NOD No. 1 response.

The closure should proceed to achieve the performance standard of WAC 173-303-610(2) rather than be restricted by proposed plan. Adjusting sampling depth according to the initial sampling results is considered acceptable. However, initial biased sampling to 12 ft was required for at least 30% of the proposed sampling locations. It has to include the two sampling locations near the geometric center of the site. Otherwise, experimental and/or theoretical demonstrations must be furnished to show that the penetration depth of the waste explosives and byproducts from the detonation process and following precipitations is less than 12 ft under the specific geological conditions of the detonation sites.

Biased sampling in the down-wind direction will also be required unless experimental and/or theoretical demonstrations can be furnished to show that the migration distance of the waste explosives and the byproducts is negligible assuming that the wind speed is less than and/or equal to 35 mph.

45. See NOD No. 44 response.

46. According to RL/WHC's response to NOD No. 72, the detonation pit at the site is not physically identifiable now, which means the depression has been refilled by outside materials. Thus, sampling in the soil from 0-6 in. may not even reach the true bottom of the demolition site. Revise the sampling scheme to accommodate a solution.

47. a. EII 5.2 only discusses soil sampling methodologies. In other words, it does not set criteria for sampling depths and intervals but rather to take the samples.

b. Handling of removed soil is not adequately addressed. A method, such as covering the removed soil or piling it, should be given.

c. Address the requirements.

48. Concur with the correction.

49. Refer action level to NOD No. 1 response.

50. Refer action level to NOD No. 1 response and Hanford Site-wide soil background to NOD No. 22 response.

51. Reject. Information requested must be provided. Incorporate into closure before submitting revision 2.

52. Analytical methods must be submitted with closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

53. Analytical methods must be submitted with the closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

54. Since a gas chromatograph unit can only do one test at each specific time, give a more detailed explanation about the "parallel" staff.

55. In SW-846-8240 (VOA method using GO/MS), volatile compounds analyzed vary in detection limits from compound to compound. The response only recognizes the highest DL.

56. Analytical procedures must be submitted with closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

57. Analytical procedures must be submitted with closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

58. See NOD Nos. 53 and 34 responses.

59. Whether it is for general information or reality, the description should be as accurate as possible, otherwise it may send the wrong messages to the public. Furthermore, if the statement is not related to the document, delete it. Don't just copy it from other demolition closure plans.

60. See NOD No. 59 response.

61. See NOD No. 2 response.

62. Concur.

63. Concur.

64. It is true that WAC 173-303 does not require the CLP format. But, since the RCRA unit is also located within a CERCLA operable unit, the CLP format will be required in the remedial action by CERCLA. It is advised, therefore, that the test results should be not less than 10% CLP deliverable SW-846.

65. Refer action level to NOD No. 1 response. Refer HSBRAM to NOD No. 24 response. Refer post-closure care to NOD Nos. 19(b) and 76 response.

66. Concur.

67. See NOD No. 44 response.

68. Concur.

69. Concur.

70. Concur.

71. Concur.

72. The location of the detonation site needs to be shown on the figure.

73. See NOD Nos. 44 and 45 responses.

74. See NOD Nos. 44 and 45 responses.

75. a. Refer to NOD No. 20 response for the issue of decomposition and reaction products.

    b. Give the specific method no. from SW-846.

    c. Refer the action level to NOD No. 1 response.

    d. PQLs are different for different materials at different laboratories. Thus, relate them to each analyte and the laboratories which will be used to test them.

76. Whether there is integration between RCRA and CERCLA or not, 218-E-8 BPDS must meet the postclosure care requirements of WAC 173-303-680(2) if the contaminated soils or ground water cannot be completely removed or decontaminated during closure. See also NOD No. 19 response.

77. The information required is for the purpose of understanding this specific document. It is not comparable to whatever has been done elsewhere. Without thorough explanation, it would be very difficult to fully assess the impact done to the environment by the demolition event. For example, without the evidence of legitimate documentation, simply changing the waste inventory for the site when questioned by the regulators is not acceptable.

78. Concur with the addition of the principal objective of initial (investigative) sampling. However, the depth of surface soil should be given. Refer the requirement on initial sampling depth to NOD No. 44 response.

79. See NOD No. 2 response.

80. Concur.

81. Concur.

200W ASH PIT DEMOLITION SITES CLOSURE REVISION 0
Ecology Response to RL/WHC response 1

1. Increasing the level of detail of the closure plan will reduce the amount of time and effort necessary to review and revise the document. As far as comparing the level of detail with other closure plans, thus far no closure plans have been approved and conditions can be written into the plan to address deficiencies noted by the regulators.

2. Concur with part of revisions of the closure plan to reflect the information provided in the response. However, the increase of 25 weeks is not acceptable according to the Tri-Party Agreement (TPA). In TPA Section 9.6.2, it is stated that non-rad waste analyses have a maximum turnaround time of 50 days. Also in TPA Section 9.6, the maximum validation and transfer times are 21 and 15 days, respectively. Thus, the maximum per Sample Delivery Group (SDG) should be 86 days. Revise the text accordingly.

   Due to suspect reporting and record keeping of wastes managed at a similar TSD (218-E-8 Borrow Pit), Appendix IX analysis of 40 CFR part 264 will be required at this unit.

3. Concur. Copies of WHC's manuals referenced should be sent to the Department of Ecology's Kennewick office.

4. Concur with the revision of text to reflect the form in which the wastes were disposed.

5. The waste codes in Table T4-1 do indicate that the material was not spent, but the table fails to provide enough information to adequately designate the waste. The sources of information provided are inappropriate for the purposes of waste designation.

6. Concur with the addition to the text of the information provided in the response, but the source of information must be provided.

7. Concur with the addition to the text.

8. Concur with the adjustment of unit boundary based on sampling and analysis data. The sampling and analysis of areas outside the present arbitrary boundary must be included in the closure plan.

9. Concur.

10. a. Concur with addition of this information in text.

b. Concur with addition of this information in text. Elaborate on the impact to waste deposition.

Note. Disposal of the remnants of a waste container in a sanitary landfill was inappropriate, due to the fact that without analysis, it was not possible to determine if the container contained a listed waste or not. If it did, the container would have been considered a listed waste.

c. Refer to comment on NOD No. 6.

d. Quality control or verification documentation for the chemical inventory detonated at the unit does not appear to exist. Soil sampling and analysis will require enhancement to assure potential contamination is not missed. Modify text to incorporate Appendix IX of 40 CFR part 264.

11. Concur with the revision of text to reflect the form in which the wastes were disposed.

12. See NOD No. 10 response.

13. Concur with the inclusion of detonation materials in list of analytes. Also include reaction and/or decomposition products as analytes. Additionally, due to suspect reporting and record keeping of wastes managed at a similar TSD (218-E-8 Borrow Pit), Appendix IX analysis of 40 CFR part 264 will be required at this unit.

14. Insert information provided in response into closure plan.

15. The response does not address the deficiencies noted. Because sections -700 to -760 of MTCA is expected to be incorporated into the Dangerous Waste Regulations before implementation of the closure plan, it is appropriate to incorporate MTCA standards (see draft clean closure guidance). But the information regarding the waste source and physical state will be required to be incorporated into the closure plan.

16. Concur.

17. Concur with response. Revise the closure plan to reflect the information provided in the response.

18. Concur.

19. Concur.

20. a. Give the definition of "Protective Closure."

    b. 200 W. APDS is regulated as a miscellaneous unit under WAC 173-303-680(4). The regulation requires that the unit must meet the postclosure care requirements of WAC 173-303-680(2), if the contaminated soils or ground water cannot be completely removed or decontaminated during closure.

21. Although the term "action levels" is defined within the closure plan as "concentrations of analytes of interest that prompt an action . . . ," the term is not defined by WAC 173-303. As the closure plan addresses a RCRA unit, and to avoid confusion on this subject, delete the term "action level." It should be noted that a definition for "cleanup level" is provided by WAC 173-340-200 which may be utilized by reference of proposed WAC 173-303-610 (scheduled to promulgated in Dec. 1993 to amend WAC 173-303-610 to include WAC 173-340-700 through 760 except 745).

22. Refer analytes traceable to the Ash Pit Demolition Site activity to NOD No. 2 response. Refer waste generated from the detonation event and the detonation materials to NOD No. 13 response.

23. Concur with the correction.

24. Ecology did receive The Hanford Site Soil Background (DOE/RL 1992d). However, the document was considered incomplete. There is still a huge task ahead in order to finish the site-wide background analysis (see detail in the memo from Charles Cline, WA State Department of Ecology, to Steven Wisness, US DOE, dated May 10, 1993).

    Requirement: Ecology must review and approve the *Hanford Site Soil Background* for RCRA closures before the values can be implemented for closure.

25. Refer the action level to NOD No. 21 response.

26. HSBRAM has not yet been approved by Ecology. Instead only some of the risk assessment requirements of the MTCA Cleanup Regulation were incorporated in HSBRAM by DOE (see detail in the Memo from DOE to George Hofer, US EPA, and Roger Stanley, WA Department of Ecology, dated May 5, 1993). Therefore, the health-based levels should substituted, where appropriate, with Model Toxics Control Act (MTCA) cleanup levels, if applicable.

27. Concur.

28. Refer the action level to NOD No. 21 response. If clean closure can not be achieved, postclosure requirement will be required regardless if CERCLA remediation is available or not at that time. If the coordination between RCRA and CERCLA is planned for postclosure care, give explicitly the planned time schedule in the next revision.

29. Concur with the correction.

30. Concur with the correction.

31. See NOD Nos. 24 and 26 responses.

32. See NOD No. 2 response.

33. See NOD No. 22 response.

34. Refer the action level to NOD No. 21 response. See also NOD Nos. 47 and 48 responses.

35. See NOD No. 2 response.

36. The purpose of the plan is to close the demolition site rather than remediate it. In order to clean close the unit, the contaminated soil or ground water should either be removed or decontaminated, otherwise the postclosure care is required. The soil sampling and analysis should emphasize this.

37. See NOD No. 23 response.

38. See NOD Nos. 47 and 48 responses.

39. See NOD No. 13 response.

40. See NOD Nos. 13 and 47 responses.

41. a. If initial samples at level II (EAL) indicate a "no action," confirmatory level III analyses will have to be done to verify this alternative.

    b. For every fifth sample, a split has to be taken and sent off for level III analyses. This will help in determining validity of level II analyses as well as give some ICP/AA metals analyses.

42. See NOD Nos. 13 and 47 responses.

43. Concur with the correction.

44. Revise text accordingly to correct errors.

45. Concur.

46. Concur with the explanations. However, it is required to do metals analysis using SW-846 method nos. 6010, 7421, 7471, 7740, and 7060 at investigative phase. If any metal is found, the same tests will have to be done at the confirmatory phase to prove clean closure.

47. Concur with EAL as analytical support to the investigative phase (level III). See additional requirements for EAL on NOD No. 41 response. Refer action limit to NOD No. 21 response.

The closure should proceed to achieve the performance standards of WAC 173-303-610(2) rather than restricted by any proposed plan. Adjusting sampling depth according to the initial sampling results is considered acceptable. However, initial biased sampling to 12 ft was required for at least 30% of the proposed sampling locations. It has to include the two sampling locations near the geometric center of the site. Otherwise, experimental and/or theoretical demonstrations must be furnished to show that the penetration depth of the waste explosives and byproducts from the detonation process and following precipitations is less than 12 ft under the specific geological conditions of the detonation sites.

Biased sampling in the down-wind direction will also be required unless experimental and/or theoretical demonstrations can be furnished to show that the migration distance of the waste explosives and the byproducts is negligible assuming that the wind speed is less than and/or equal to 35 mph.

48. The RL/WHC response to NOD number 48 is "see comment response #48." This is not an adequate response. See also NOD No. 47 response.

49. According to RL/WHC's response to question No. 74, the detonation pit at the site is not physically identifiable now, which means the depression has been refilled by outside materials. Thus, sampling in the soil from 0-6 in. may not even reach the true bottom of the demolition site. Revise the sampling scheme to accommodate a solution.

50. a. EII 5.2 only discusses soil sampling methodologies. In other words, it does not set criteria for sampling depths and intervals but rather to take the samples.

b. Handling of removed soil is not adequately addressed. A method, such as

covering the removed soil or piling it, should be given.

c. Address the requirements.

51. Refer action level to NOD No. 21 response.

52. Refer action level to NOD No. 21 response and Hanford Site-wide soil background to NOD No. 24.

53. Reject. Information requested must be provided. Incorporate into closure before submitting revision 2.

54. See NOD No. 2 response.

55. Analytical methods must be submitted with closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

56. Analytical methods must be submitted with the closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

57. Since a gas chromatograph unit can only do one test at each specific time, give a more detailed explanation about the "parallel" staff.

58. Analytical procedures must be submitted with closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

59. Analytical procedures must be submitted with closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

60. See NOD No. 57 response.

61. Concur with the explanation.

62. The RL/WHC response to NOD number 62 is "see comment response #62." This is not an adequate response. See also NOD No. 61 response.

63. See NOD No. 2 response.

64. Concur.

65. Concur.

66. It is true that WAC 173-303 does not require the CLP format. But, since the RCRA unit is located within a CERCLA operable unit, the CLP format will be required in the remedial action by CERCLA. It is advised, therefore, that the test results should be not less than 10% CLP deliverable SW-846.

67. Refer to NOD Nos. 25 and 26 responses.

68. Concur.

69. See NOD No. 47 response.

70. Concur.

71. Concur.

72. Concur.

73. Concur.

74. The location of the detonation site must be shown on the figure.

75. See NOD Nos. 47 and 48 responses.

76. See NOD Nos. 47 and 48 responses.

77. a. Refer to NOD No. 22 response for the issue of decomposition and reaction products.

    b. Give the specific method no. from SW-846.

    c. Refer the action level to NOD No. 21 response.

    d. PQLs are different for different materials at different laboratories. Thus, relate them to each analyte and the laboratories which will be used to test them.

78. Whether there is integration between RCRA and CERCLA or not, 200 W. APDS must meet the postclosure care requirements of WAC 173-303-680(2) if the contaminated soils or ground water cannot be completely removed or decontaminated during closure. See also NOD No. 20 response.

79. The information required is for the purpose of understanding of this specific document. It is incomparable to whatever has been done elsewhere. Without thorough explanation, it would be very difficult to fully assess the impact done to the environment by the demolition event. For example, without the evidence of legitimate documentation, simply changing the waste inventory for the site when questions were raised by the regulators is not acceptable.

80. Concur with the addition of the principal objective of initial (investigative) sampling. However, the depth of surface soil should be given. Refer the requirement on initial sampling depth to NOD No. 47 response.

81. See NOD No. 2 response.

82. Concur.

83. Concur.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
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Subject: NOTICE OF DEFICIENCIES (NODs) FOR THE 200 W ASH PIT AND 218-E-8 BORROW PIT DEMOLITION SITES

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		RCRA File/GHL	H6-23	
		DMKO/LB	H6-23	